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UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: Bair Hugger Forced Air Warming
Products Liability Litigation

This Document Relates to All Actions

JOINT MOTION REGARDING
CONTINUED SEALING

Documents have been filed under temporary seal in connection with the following motion:

Plaintiffs' Motion for Exclude the Testimony of Dr. Richard P. (Doc. Wenzel No. 812)

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

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DKT. NO.	DESCRIPTION OF DOCUMENT	MARK "X" IN APPLICABLE COLUMN			NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED ¹
		Parties Agree Doc. Should Remain Sealed	Parties Agree Doc. Should Be Unsealed	Parties Disagree	(II ANT)	
814	Exhibit B to the Declaration of Genevieve M. Zimmerman: Redacted Report of Richard P. Wenzel, MD, MSc.		Х		Augustine	

Dated: November 7, 2017 Respectfully submitted,

Jerry W. Blackwell (MN #186867) Benjamin W. Hulse (MN #0390952) Mary S. Young (MN #0392781) BLACKWELL BURKE P.A. 431 South Seventh Street

Suite 2500

Minneapolis, MN 55415 Phone: (612) 343-3256 Fax: (612) 343-3205

Email: blackwell@blackwellburke.com myoung@blackwellburke.com bhulse@blackwellburke.com

Bridget M. Ahmann (MN #016611x) FAEGRE BAKER DANIELS LLP 2200 Wells Fargo Center 90 South Seventh Street

Minneapolis, MN 55402

(612) 766-7000

Email: bridget.ahmann@faegrebd.com

Counsel for Defendants 3M Company and Arizant Healthcare, Inc.

Michael V. Ciresi (MN #0016949) Jan M. Conlin (MN #0192697)

CIRESI CONLIN LLP 225 S. 6th St., Suite 4600 Minneapolis, MN 55402 Phone: 612,361,8202

Email: MVC@CiresiConlin.com JMC@CiresiConlin.com

Ben W. Gordon, Jr. (Pro Hac Vice)

LEVIN, PAPANTONIO, THOMAS, MITCHELL,

RAFFERTY & PROCTOR, P.A. 316 South Baylen Street, Suite 600

Pensacola, FL 32502-5996 Phone: (850) 435-7091 Fax: (850) 435-7020

Email: bgordon@levinlaw.com

Genevieve M. Zimmerman (MN #330292)

MESHBESHER & SPENCE, LTD.

1616 Park Avenue South Minneapolis, MN 55404 Phone: (612) 339-9121 Fax: (612) 339-9188

Email: gzimmerman@meshbesher.com

Co-Lead Counsel for Plaintiffs

- 1. contains information designated as confidential by a nonparty
- 2. contains information designated as confidential under a non-disclosure agreement between plaintiff and nonparty
- 3. contains information designated as confidential under a protective order issued in this case [MDL 2666 Docket No. 39]
- 4. discovery materials filed in connection with a motion under Fed R. Civ. P. 37
- 5. reveals trade secrets of defendant

ⁱ This explanation should be very brief. For example:

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- 6. reveals proprietary business methods of plaintiff
- 7. confidential financial records
- 8. confidential medical records
- 9. contains termination information regarding former employees of defendant
- 10. reveals information regarding a minor
- 11. contains information ordered sealed by the court on DATE [Docket No. XX]